DOCUMENT RESUME

ED 325 574 UD 027 717

TITLE	State Plan to Address the Educational Needs of Homeless Children and Youth.
INSTITUTION	Massachusetts State Dept. of Education, Boston.
PUB DATE	May 90
NOTE	36p.
PUB TYPE	Legal/Legislative/Regulatory Materials (090)
EDRS PRICE	MF01/PC02 Plus Postage.
DESCRIPTORS	*Access to Education; Children; *Disadvantaged Youth; *Educational Legislation; *Educational Needs; Educational Policy; Elementary Secondary Education; *Homeless People; Student Transportation; Youth
IDENTIFIERS	*Massachusetts; *Stewart B McKinney Homeless Assistance Act 1987

ABSTRACT

The purpose of this document is to give guidance to local educational agencies and supply them with resources to meet the educational needs of homeless children in Massachusetts in accordance with the Stewart B. McKinney Homeless Assistance Act (PL 100-77). Contents are as follows: "Part I, Introduction" discusses the history and purpose of the law and provides relevant definitions; "Part II, Federal Laws and Massachusetts Laws and Policies regarding Education of Homeless Children and Youth"; "Part III, Goals, Objectives of the Massachusetts Department of Education relating to the Education of Homeless Children"; and "Part IV, Appendix," which contains a list of objectives, a timeline for proposed activities, and a list of regional liaison officers. (DM)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

STATE PLAN TO ADDRESS THE EDUCATIONAL NEEDS OF HOMELESS CHILDREN AND YOUTH

May 1990

Massachusetts Department of Education
Office for the Education of Homeless Children and Youth
Michelle Fryt Linehan
(617) 770-7493

" All children, including children living in shelters, motels, and other temporary living situations, must be guaranteed a free and appropriate public education. Any educational program which consists of multiple school placements during the course of an academic year is not appropriate and will only serve to impede a child's education and overall development. We must not allow homeless children to experience further instability and inconsistencies in their lives by forcing them to move from school to school. The goal of the Department of Education is to ensure that homeless children have the chance to remain in one school, with familiar peers, teachers, and curricula. To accomplish this goal all agencies involved with homeless families must work together with schools and parents to address the issues which keep families locked into a cycle of instability and transiency."

Harold Raynolds, Jr., Commissioner
Massachusetts Department of Education

TABLE OF CONTENTS

I. **Introduction** — Page

A. History 1
B. Purpose 1
C. Format 1, 2
D. Definitions 2, 3

II. **Federal Laws and Massachusetts Laws and Policies Regarding Education of Homeless Children and Youth**

A. District of Attendance and General Educational Services 5, 6
B. Transportation 7
C. Transfer of School Records 8, 9
D. Chapter I Services for Adolescent Shelters 10
E. Services for Homeless Children Who Find Permanent Housing During the School Year 10
F. Resolution of Disputes and Assurance of Compliance. . . 11, 12
G. Data Collection 13
H. Homeless Advisory Committee 13

III. **Goals, Objectives of the Massachusetts Department of Education Relating to the Education of Homeless Children**

A. Transportation 15, 16
B. Tutorial Services 17
C. Inservice Training for School, Shelter and Social Services Personnel and Homeless Parents 18, 19
D. Interagency Collaboration 20

IV. **Appendix**

A. List of Objectives/Activities: September 1988 to May 1990 . . . . . 21 - 23
B. Composite Timeline for Proposed Activities 24, 25
C. Department of Education's Regional Homeless Liaisons 26 - 29
D. Sample Opening Letter of Complaint Management System 30

I. INTRODUCTION

A. History

In July 1987 President Reagan signed into effect Public Law 100-77, the Stewart B. McKinney Homeless Assistance Act. The purpose of this omnibus legislation is to aid homeless individuals and families by providing states with federal funds to establish programs for homeless persons. Title VII, Subtitle B of this public law addresses the education of homeless children. Four requirements of Subtitle B are:

- to establish or designate an Office of Coordinator of Education of Homeless Children and Youth;
- to annually gather data on the number and location of homeless children and youth in the State, and such data gathering shall include the nature and extent of problems of access to, and placement of, homeless children and homeless youth in elementary and secondary schools, and the difficulties in identifying the special needs of such children;
- to prepare and submit to the Secretary not later than December 31 of each year a report on the data gathered;
- Each State shall adopt a plan to provide for the education of each homeless child or homeless youth within the State.

To date the Massachusetts Department of Education has received three years of funding (averaging around $91,000 each) under Subtitle B of the McKinney Act. These funds have been used to carry out the requirements of the McKinney Act and to develop pilot projects to meet the educational needs of homeless children and youth in the Commonwealth. (See Appendix A for a list of the accomplishments of this Office from September 1988 to May 1990.)

B. Purpose

A major purpose of the following plan is to guide local education agencies and supply them with resources as they attempt to meet the educational needs of homeless children. It clarifies Massachusetts Department of Education's policies relating to the education of homeless students and describes future goals and strategies.

The plan was created as a document which can be amended, when applicable, to best serve homeless children. This is the first revision of the original plan approved by the Board of Education in March 1989. A change in the format of the plan will allow for easier revisions in the future, as the more "fluid" parts of the plan (i.e., goals, objectives, timeline) have been separated from the policy section.

C. Format

After the introductory section, the plan contains two major components: a section which delineates federal and state laws and state policies regarding the education of homeless children, and a section detailing

the goals and objectives of the Department as related to the education of homeless children and youth with timelines for achieving these goals. (See appendix B for a composite timeline of the activities.)

D. Definitions

As used in this plan, the following words shall have the meanings stated below:

1. Homeless: A homeless individual is one who (1) lacks a fixed, regular, and adequate residence, or (2) has a primary nighttime residence in a supervised publicly or privately operated shelter for temporary accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill), an institution providing temporary residence for individuals intended to be institutionalized, or a public or private place not designated for, or ordinarily used as, a regular sleeping accommodation for human beings. [McKinney Homeless Assistance Act, Section 103 (a) (1) (2)]

According to guidelines developed by the United States Department of Education (USED), this includes those children/youth living in family, adolescent, battered women, and transitional housing shelters, in cars, in abandoned buildings, and on the street. Three additional conditions of homelessness specified by the USED guidelines include:

1) In general, children living in foster homes should not be considered as homeless. However, **children placed in foster homes for lack of shelter space,** should be considered homeless.

2) Sick or abandoned children in hospitals, who would otherwise be released if they had a place to go, should be considered as homeless. There are instances where children remain in hospitals beyond the time that they would normally stay for health reasons because they have been abandoned by their families, or their parents have died. These children should be considered homeless because they have no other place to live.

3) Children living in trailer parks and campgrounds should be considered homeless if they are staying temporarily in parks or camping areas because they lack living accommodations that would be considered adequate under section 103 of the McKinney Act. (See above.) Those living in trailer parks on a long-term basis in adequate accommodations, however, should not be considered homeless.

Children/youth living in "doubled-up" situations should as be considered homeless. The "doubled-up" or "hidden homeless" population is defined as:

• any child or youth temporarily living in an overcrowded situation (with or without their parents) with friends or relatives because they have been displaced from their previous residence due to one or more or the following reasons in which the child/youth and/or his/her family:

• were paying over 50% of their income for rent and were evicted when they failed to make rent payments;
• left the previous residence because of an abusive situation;
• were displaced by a public improvement, or condemnation resulting from enforcement of the state sanitary code;
• were displaced due to condominium conversion or removal of the unit from the rental market;
• were displaced due to substandard housing conditions that posed a threat to the health and safety of the household;
• were displaced due to a fire or other catastrophic event;
• were displaced because of over-crowded conditions in the previous residence.

2. Child/Youth: those persons who, were they children of residents of the State, would be entitled to a free public education [McKinney Nonregulatory Guidance]

3. School District: the entire geographic area under the control of a particular school committee

4. School Attendance Zone: an intra-district area defined by local school authorities, the residents of which are entitled to attend the public school serving that area (Corresponds with the term "geocode".)

5. School District or Attendance Zone of Origin: the school district or attendance zone, within the Commonwealth of Massachusetts, in which a homeless child was last enrolled prior to becoming homeless.

6. School District or Attendance Zone of Temporary Residence: the school district or attendance zone, within the Commonwealth of Massachusetts, in which the shelter, motel/hotel or other temporary living situation is located.

FEDERAL LAWS AND MASSACHUSETTS LAWS AND POLICIES REGARDING THE EDUCATION OF HOMELESS CHILDREN AND YOUTH

A. District of Attendance and General Educational Services

1.1 Federal Law (McKinney Act)

"Each State shall adopt a plan to provide for the education of each homeless child or homeless youth within the State which will contain provisions designed to -

(A) authorize the State educational agency, the local educational agency, the parent or guardian of the homeless child, the homeless youth, or the applicable social worker to make the determinations required under this section;"

[42 U.S.C. sec 11432 (e)(1)]

"The local educational agency of each homeless child or youth shall either -

(A) continue the child's or youth's education in the school district of origin for remainder of the school year, or

(B) enroll the child or youth in the school district where the child is actually living:

whichever is in the child's best interest or the youth's best interest. The choice regarding placement shall be made regardless of whether the child or youth is living with the homeless parents or has been temporarily placed elsewhere by the parents."

[42 U.S.C. sec 11432 (e)(3) & (4)]

"Each homeless child shall be provided services comparable to services offered to other students in the school selected according to the provisions of paragraph (3), including educational services for which the child meets the eligibility criteria, such as compensatory educational programs for the disadvantaged, and educational programs for the handicapped and for students with limited English proficiency, programs in vocational education, programs for the gifted and talented, and school meals programs."

[42 U.S.C. sec 11432 (e)(5)]

1.2 Massachusetts Law

"Every person shall have a right to attend the public schools of the town where he actually resides."

(Mass. G.L., c. 76, S5)

1.3 Policy of the Massachusetts Department of Education

Parents or guardians of homeless children have the right to choose whether to continue to have their children attend school in the district of origin or to enroll them in the school district of temporary residence. In cases where a child is moving from place to place within one district, the Department of Education strongly urges school districts to extend this right to parents of these homeless children as well since this is consistent with the intention of the McKinney Act. These children have the right to receive any educational programs (i.e., Chapter 1, bilingual, gifted and talented, special education, vocational education, school meals, etc.) for which they meet the eligibility criteria, and such students are expected to abide by the code of conduct

criteria, and such students are expected to abide by the code of conduct pertaining to all students adopted by the school committee of the district in which they are attending school.

(a) Parents or guardians of homeless children and adolescents who are in temporary or voluntary custody of the Massachusetts Department of Social Services (DSS), or any other designated state agency, may still maintain the right to choose which school their child will attend. In cases where DSS or another designated agency has permanent custody of the homeless child or adolescent, the appropriate social worker is entitled to choose which school the child/youth will attend unless a legal guardian or an Educational Advocate for special educational needs has been designated. The legal guardian or the Educational Advocate would then be entitled to select which school the child/youth will attend.

(b) Any homeless youth who is eighteen years of age or over has the right to decide which school he/she will attend.

(c) The decision regarding which school a homeless adolescent, who is under eighteen years of age and is living apart from his/her parents, will attend will be deferred to parental choice, unless the parents are uninvolved. When the parents are not involved the decision will be deferred to the youth until custody is assumed by an agency or individual. The filing of an appropriate CHINS or Care and Protection petition and/or a referral to the Department of Social Services should be considered by the shelter providers or other involved persons. The legal guardian will then be responsible for the choice of schools as described in paragraph 1.3 and 1.3(a) above. If the adolescent has or is suspected of having special educational needs and his/her parents are deceased, out-of-state, unknown, cannot be located, or are otherwise unavailable to participate in the special education process, the receiving school will refer the adolescent to the Department of Education for the appointment of an Educational Advocate to represent the adolescent in the special education process.

(d) In giving this right to the parents (except in cases as mentioned above) the Department of Education assumes that the parents will make their decisions based on what is best for the child. When the parents (or others) are in the process of making this decision, the input of the child's present teacher should be an essential part of this decision-making process. Parents should consider the following as they decide which school their child will attend:

* length of commute to/from school and cost of such transportation
* special educational needs of child
* continuity in one educational program
* geographical area in which housing search is being done
* number and ages of siblings and schools they are attending
* month of the school year
* schools other children (if any) in the shelter/motel are attending
* number of times child has changed schools in the past
* how long the child has been in a particular school
* how long the child has been in the city
* relationship of child with teachers

B. Transportation for Homeless Children

2.1 Massachusetts Law

Massachusetts school committees must provide transportation to students who reside in excess of two miles from the school they are entitled to attend.
(Mass G.L., c. 71, sec 68)

Towns will receive state reimbursement for transportation provided to students who reside at least one and one-half miles from the school they are entitled to attend.
(Mass G.L., c. 71, sec 7A)

2.2 Policy of the Massachusetts Department of Education

Homeless children who are attending the school assigned to them by the local school district are entitled to the same school transportation that is offered to other children in that district. If homeless children are attending school in their attendance zone of origin and this is different than their attendance zone of temporary residence, the local school district is urged to transport them to/from their school of attendance; these transportation costs are reimbursable under the regular schedule of reimbursement from the state of Massachusetts.

Homeless children with special needs who wish to continue to attend their original school (even though they are living in another district) and have transportation written into their Individualized Education Plan (IEP), must be transported from their temporary residence to their school of origin until the end of the school year. Chapter 766 Regulations regarding the time a child can spend being transported to/from school, apply here: "The school committee shall not permit any child in need of special education to be transported in a manner which requires a child to remain in the vehicle for more than one hour each way except with the written request of a TEAM, and the approval of the Administrator of Special Education." (905.2) The original district is responsible for transporting the child for the remainder of the school year. They can negotiate with the district in which the child is temporarily living to provide the transportation, but the educating district is ultimately responsible for ensuring the child is transported.

The parents of homeless children who are placed in a shelter or other temporary living situation in one district and choose to have their children continue attending school in their district of origin are responsible for transporting their children to/from that school. They may seek assistance for such transportation from either district, but if the school districts are not able to transport the children to/from school the parents are responsible for this transportation.

C. Transfer of School Records

3.1 Federal Law (McKinney Act)

"The school records of each homeless child or youth shall be maintained-
(A) so that the records are available in a timely fashion, when a child or youth enters a new school district; and
(B) in a manner that is consistent with section 438 of the General Education Provisions Act."
[42 U.S.C. sec 11432 (e)(6)]

3.2 State Regulations

Massachusetts Department of Education's Student Records Regulations 603 CMR 23.01-23.12

3.3 Policy of the Massachusetts Department of Education

All homeless children/youth are entitled to start school immediately upon registration, except for those children who have not been properly immunized. The regular Massachusetts policy on record transfer will be adhered to with additional considerations for homeless children. The provisions delineated in section 3.3 (a) and (b) should be followed only after the following two conditions have been met:

1) the parent or guardian of a homeless child, or a homeless youth who is fourteen years of age or over, or in the 9th grade, gives written consent to school personnel to make the telephone calls described below, and
2) the parent or guardian of a homeless child, or a homeless youth who is fourteen years of age or over, or in the 9th grade, signs a release-of-information form which is in the process of being mailed back to the sending school so that the child's/youth's original school records will be sent to the receiving school.

(a) If a homeless child wishes to register in a school and does not have a transfer card or any other written record of immunization but has been immunized and the records are on file at a previous school, the school nurse of the receiving school may call the school nurse of the sending school and take the immunization information over the telephone. When the school nurse has verified that the student has been age-appropriately immunized and a new school health record card completed, the student may start school in the new setting. This will ensure availability of records if the student transfers again soon.

(b) Whenever documentation of the student's immunization history is missing, the student is considered to be not immunized and may not enter school until the first in-the-series of immunizations have been administered. School personnel should then direct the child's parents to the local Department of Public Health office or a local clinic where the vaccines are administered. If the school nurse is eligible to administer the vaccines he/she should provide these services to the family.

(c) In accordance with the Massachusetts Department of Public Health requirement (105 CMR 460.050) all children must be screened for lead poisoning at least once prior to entering kindergarten and evidence, such as a note from a physician or health care clinic indicating that the child has been previously screened, is required. **But homeless children cannot be excluded from school because they have not been screened or do not have the proper documentation**. They must be allowed to start school with the understanding that such a screening will be forthcoming within a reasonable amount of time. If the parent is confident that their child has been screened, but is having trouble producing the documentation, personnel in the Department of Education's Office for the Education of Homeless Children and Youth, and the Bureau of Student Services and Health can assist these families to obtain verification of the screening dates. As with the immunization records, information on lead screenings can be transferred over the telephone.

(d) The school receiving a homeless child can verify the child's general academic record (i.e., grade level, general test scores) by calling the sending school and asking for the information over the telephone.

(e) If a homeless child was previously enrolled in a special education program but has no records of this on hand, the sending school must provide the parents or eligible student access to these records within two consecutive weekdays after the initial request. [Student Record Regulations 23.07 (2)] **Non-receipt of records cannot be used as a reason to delay services for the child.** Schools should offer the child the most appropriate services based on the information they do have until the records arrive. If parents or the receiving school do not receive these records within the 2-day period, they can either call the sending school to inquire into the reason for the delay, of call the Department of Education's Regional Center Homeless Liaison for their geographical area (see Appendix C for the names of these people) to help enforce this record transfer regulation.

(f) Collaboration between various state agencies and school districts can create a smooth transition for homeless children who are moving from one school to another. Workers from the Departments of the Public Welfare and Social Services assigned to the homeless families can work with these families to ensure the current medical, educational, psychological, and other pertinent records are provided to the receiving school. But, in all cases, the families involved must be informed that such information may be or is being shared with other state or local agencies.

D. Chapter 1 Services for Adolescents in Shelter Care

4.1 Federal Regulations (Chapter 1 Rules and Regulations)

"Except as provided in sec 200.24, an SEA shall allocate county aggregate amounts to LEAs as follows:

(a) Allocations based on children in local institutions for neglected or delinquent children. (1)(i) Except as provided in paragraphs (a)(2), (3) and (4) of this section, the SEA shall first allocate to a particular LEA that portion, if any, of the county aggregate amount that is based on the total number of children aged 5 to 17, inclusive, in the LEA's school district who resided in a local institution for neglected or delinquent children - and were not counted under Subpart 3 of Part D of Chapter 1 (programs for neglected or delinquent children operated by State agencies) - for at least 30 consecutive days, at least one day of which was in the month of October of the preceding fiscal year."

"'Institution for neglected children' means, as determined by the SEA, a public or private residential facility - other than a foster home - that is operated primarily for the care of children who have been committed to the institution- or voluntarily placed in the institution under applicable State law- because of the abandonment by, neglect by, or death of parents."

4.2 Policy of the Massachusetts Department of Education

Adolescent shelters in Massachusetts, which are recognized as licensed agencies by either the state or federal government, and which shelter youth who have either run away from home, been "thrown out" of their home, or who are homeless for any other reason, shall be considered as "local institutions for neglected children". As such facilities they shall be eligible to receive Chapter 1 services as delineated in the Chapter 1 Rules and Regulations.

E. Services For Homeless Children Who Find Permanent Housing During the School Year

5.1 Policy of the Massachusetts Department of Education

Children who move from a homeless situation (i.e., living in a shelter, motel or doubled-up situation) into a permanent residence during the course of a school year have the right to stay in the school they were attending while living in the shelter, motel, or doubled-up situation until the end of that school year. The parents have the right to make this decision (except in those cases listed in Section 1.3). If the parents decide to keep their child in the school he/she were attending while they were homeless, and this school is not within the boundaries of the school attendance area in which they are permanently housed, the parents must provide the transportation for their child to/from school.

F. Resolution of Disputes and Assurance of Compliance

6.1 Federal Law (McKinney Act)

"Each State shall adopt a plan to provide for the education of each homeless child or homeless youth within the State which will contain provisions designed to -

(B) provide procedures for the resolution of disputes regarding the educational placement of homeless children."

[42 U.S.C. sec 11432 (e)(1)]

6.2 Policy of the Massachusetts Department of Education

To settle disputes or complaints of non-compliance regarding the education of a homeless child or youth, the Department's Complaint Management System will be followed. Corporal punishment and complaints concerning students who are out of school without educational services shall be given priority at all stages of the complaint process so that they may be investigated and resolved at the earliest possible date. The steps of the Complaint Management System are as follows:

1) The Department recommends that, if at all possible, the person having a complaint first contact the school or school district (for example, the principal or superintendent of schools) to present their concerns to the people closest to the situation and most likely to be able to resolve it quickly.

2) If step #1 does not work or does not seem possible under the circumstances, the person filing the complaint may call or write the Department of Education Regional Center in their area, and state their concern. (See Appendix C for a list of the liaisons and the regions they cover.) A Department employee (Education Specialist) will contact the person filing the complaint within 24 hours to discuss the issue. If the concern is found to be a complaint, a letter will be sent within 3 business days to the person filing the complaint. This letter will state the number of the complaint, the name of the Education Specialist who will handle it and information on the steps of the Complaint Management System. (See Appendix D for a sample opening letter.) If the concern is not a complaint (for example, it is simple a request for information, or involves a school or program, such as a college, that is outside the Department's responsibility), the Department will provide the necessary information.

3.) The Education Specialist will carefully review the concerns with the person filing the complaint and the appropriate school officials to determine whether the education laws and regulations are being followed. If the school system is not meeting the requirements of the law, the Department will work with the officials to correct the problem. Most problems must be resolved within 30 business days of the receipt of the complaint. In cases where this is not possible, the Education Specialist will send the person filing the complaint a letter explaining the reason.

4.) The Education Specialist will send the person filing the complaint a letter explaining the results of the review of the complaint and the actions that have been taken to resolve the problem. If the concern is found not to be a complaint, the reason will be explained in the letter.

5.) Within 10 business days of the date of the letter, the person filing the complaint may ask the Director of the Department's Regional Center (or, for the Boston/Chelsea school complaints, the Director of the Boston/Chelsea team) to review the matter. The Director will review written materials relating the to complaint and send the person filing the complaint a decision letter within 10 business days.

6.) If the person filing the complaint is still dissatisfied, they may contact the Department's Deputy Commissioner for Program Operations within 10 business days of the Regional Director's decision. The Deputy Commissioner will review the written materials and send the person filing the complaint a decision letter within 20 business days. For complaints involving certain federally-funded programs, you may ask the U.S. Secretary of Education to review the Regional Director's decision.

If the dispute concerns the placement of a homeless child in school, the time needed to settle the dispute must not delay the child's entry into school. Until the dispute is settled the child will attend the school the parents or guardians have chosen. (See Section 1.3.)

G. Data Collection

7.1 Federal Law (McKinney Act)

"The Coordinator of Education of Homeless Children and Youth established in each State shall -

(1) annually gather data on the number and location of homeless children and youth in the State, and such data gathering shall include the nature and extent of problems of access to, and placement of, homeless children and homeless youth in elementary and secondary schools and the difficulties in identifying the special needs of such children;"

[42 U.S.C. sec 11432 (d)(1)]

7.2 Policy of the Massachusetts Department of Education

The Coordinator of the Office for the Education of Homeless Children and Youth is responsible for the data collection relating to the education of homeless children required by the United States Department of Education. Such state-wide data will include:

- number of homeless children of school-age, broken down by grade level
- location of these children (i.e., public or private shelters, hotels/motels, living with friends or relatives, etc.)
- problems homeless children encounter in receiving all the educational services to which they are entitled
- number of homeless school-age children not attending school, if any
- reasons, if any, homeless children are not attending school
- unique educational needs of homeless children

H. Homeless Advisory Committee

8.1 Federal Law (McKinney Act)

"The State will consult with relevant advisory committees, local agencies, interest groups, and experienced professionals in the development of the State's plan."

[Assurances, GEPA, 6(a)]

8.2 Policy of the Massachusetts Department of Education

The Office for the Education of Homeless Children and Youth will establish and maintain an Advisory Committee composed of homeless or formerly homeless parents, representatives from other state agencies, community service organizations, school personnel, and other interested parties to advise the Department on the formation, implementation and revisions of a state plan for the education of homeless children and future related activities.

GOALS AND OBJECTIVES OF THE MASSACHUSETTS DEPARTMENT OF EDUCATION RELATING TO THE EDUCATION OF HOMELESS CHILDREN AND YOUTH

A. Transportation

Goal:

to ensure that all homeless children in Massachusetts who live in excess of two miles from their school of attendance will receive transportation to/from that school.

Objective #1:

A system will be established to provide transportation to/from school for homeless children who are attending school in their **district of origin** and this is different than their **district of temporary residence**.

Activities to Meet Objective 1	Proposed Timeline to Meet Objective 1
a.) Collaborate with the Dept of Public Welfare to develop a system by which school districts can be reimbursed for transportation of homeless children to/from school across district lines through Emergency Assistance (EA) funds	May - August 1990
b.) Disseminate a brochure describing the way in which school districts can access the EA funds for such transportation.	August 1990
c.) Provide $50,000 through the Department of Education's transportation budget to be used to reimburse cities and towns which transport homeless children across district lines.	Language exists in Governor's 1991 budget; Continue to pursue such transportation funds
d.) Continue to pursue state legislation to provide for the reimbursement of cities and towns which provide between-district transportation for homeless children.	Bill refiled by the Board of Education in November 1989; received favorable report from the Education Committee in April 1990. Continue to pursue this legislation.
e.) Work with the National Association of State Coordinators of the Office for the Education of Homeless Children and Youth (NASCEHCY) to incorporate language in the federal McKinney Act which would allow for the expenditure of McKinney funds for direct services, including transportation.	Position document written by NASCEHCY in December 1989 stresses the need for direct service money. This organization is working with Senator Edward Kennedy's office and Representative Louise Slaughter's office as they submit bills to Congress regarding Subtitle B of the McKinney Act for the federal FY 1991 budget; pursue this work at the federal level if not passed for FY 1991.

Objective #2:

A system will be established to provide transportation to/from school for homeless children who are attending their **school of origin,** but are living in a different **attendance zone** within the same district.

Activities to Meet Objective 2	Proposed Timeline to Meet Objective 2
a.) Pursue activities (d) and (e) listed in table above.	As noted above.
b.) Set up meetings between school administrators, personnel from pertinent state and local agencies (i.e., Dept of Public Welfare, Dept of Social Services, Office for Children, community action agencies, shelters) to discuss the transportation issue on the local level; formulate local networks to assist homeless children acquire transportation to/from school.	Cape Cod Homeless Children's Network established in May 1990 - continue working with this group. Set up meeting between Boston Public Schools personnel and shelter providers in the summer of 1990. Focus on other geographical areas where transportation for homeless children is an issue --- ongoing.

B. Tutorial Services

Goal:

Homeless children within the Commonwealth of Massachusetts will have access to any existing tutorial services set up by local school systems or available through volunteer tutor networks to be used as supplements to or, when enrollment in any school system is not in the best interest of the child/youth, in lieu of a regular educational program.

Objective #1:

If a homeless child/adolescent is not receiving any educational services and enrollment in any school is not in the best interest of the child/adolescent, he/she will have access to tutorial services which provide a temporary educational program. These will be provided only as a last resort, after placement within a school system has been thoroughly investigated and it is decided that such placement will be detrimental to the homeless youth or other students in the school system.

Activities to Meet Objective 1	Proposed Timeline to Meet Objective 1
a.) Inform adolescent shelters of educational services available through Chapter 1. Hold meeting with adolescent shelter providers about how to apply for these services.	Hold informational meeting in September of each year to help shelter providers complete the necessary form to apply for Chapter 1 services. Provide technical assistance to adolescent shelter providers around this issue - ongoing.
b.) Continue to seek funding for the existing adolescent shelter tutorial programs; seek funding to expand these models to other sites.	Apply for McKinney Exemplary Program funds - May 1990, May 1991, May 1992 Explore other sources of funding - ongoing.

Objective #2:

In cases where a homeless child is enrolled in an educational program but is exhibiting academic delays or experiencing difficulty with his/her schoolwork, he/she will have access to tutorial services.

Activities to Meet Objective 2	Proposed Timeline to Meet Objective 2
a.) Continue to provide grants to school districts to develop and implement tutorial programs for homeless children.	Apply for McKinney Exemplary Program Funds in May 1990, May 1991 and May 1992
b.) Evaluate the school-based tutorial programs and modify as needed.	May 1990 - ongoing
c.) Develop a shelter-based tutor volunteer network in the Boston area.	Initiate this in May 1990 with ongoing evaluation, expansion and support to volunteers.

C. **Inservice Trainings for School, Shelter and Social Service Personnel and Homeless Parents**

Goal:

to support all persons involved with homeless students, including school personnel, social service providers and parents, as they attempt to meet the unique emotional, social, educational and physical needs of these children across a variety of settings.

Objective #1:

The Massachusetts Department of Education, in conjunction with the Departments of Public Welfare, Social Service, Public Health and Mental Health, homeless individuals, and local service agencies (community action agencies, advocacy groups) will continue to hold inservice trainings to provide information/resources to school personnel who work with homeless children.

Activities to Meet Objective 1	Proposed Timeline to Meet Objective 1
a.) Continue to hold regional inservice workshops to bring school personnel together with shelter providers and social service providers.	workshop for Cape Cod and Islands: September 1990; workshop for South Shore area: September 1990; workshop for Greater Boston area: October 1990; workshop for Greater Pittsfield area: September 1990
b.) Organize an "inservice team" consisting of personnel from the Dept of Education, Welfare, Social Services, Mental Health and Public Health, as well as shelter providers and community based agencies to go into schools which serve homeless children to present an inservice workshop for the school staff.	Organize the "inservice team" : July 1990; Design and disseminate a brochure about the team and the inservice program to all schools in the state: August 1990; hold inservice workshops in schools which request it: ongoing
c.) Organize a meeting between administrative personnel from the Boston Public Schools (i.e., zone superintendents, staff from the Dept of Implementation) and local shelter providers to discuss pertinent issues such as transportation, transfer from school to school and record transfer.	Hold this meeting in early August 1990

Objective #2:

The Massachusetts Department of Education will hold inservice workshops for shelter personnel and social service providers regarding the educational rights of homeless children, the Department's policies and procedures relating to special education and Chapter I services, student records, transportation and other pertinent educational issues.

Activities to Meet Objective #2	Proposed Timeline to Meet Objective 2
a.) Organize an inservice meeting for family, battered women and adolescent shelters to address the issues in Objective #2.	October, November 1990 and 1991 and 1992
b.) Hold an informational meeting for adolescent shelter providers about applying for Chapter 1 services.	September 1990, September 1991

Objective # 3:

The Massachusetts Department of Education will provide informational meetings with homeless parents to discuss the educational rights of their children and the education system in general, including how to advocate for educational services for their children.

Activities to Meet Objective 3	Proposed Timeline to Meet Objective 3
a.) Disseminate a brochure to shelters, the Department of Public Welfare, Department of Social Services and other agencies involved with homeless families (Project Better Health, motel managers, community action agencies) which describes the inservice program for homeless parents. Ask these agencies to pass this information onto the parents and, if possible provide space for such an inservice to take place.	Design and Disseminate Brochure: September 1990; Hold inservice workshops: October 1990 through May 1992
b.) Revise present brochure "Keeping Your Children in School" and disseminate to parents through shelters, Dept of Public Welfare, Dept of Social Services, etc.	Revise brochure: June 1990 Disseminate brochure: start in July 1990 with ongoing distribution

D. Interagency Collaboration

Goal:

to strengthen collaboration between involved state agencies (including the Departments of Social Services, Public Welfare, Public Health, Mental Health, Office for Children), school districts, community agencies, advocacy groups, and shelters providers to ensure that homeless children will have the opportunity to remain in one school during the academic year in which they are homeless, will receive all of the services to which they are entitled, and that any school transfers will cause the least amount of disruption to the child and his/her family.

Objective #1:

A network will be developed between schools, shelters, state agencies and community agencies to allow for increased communication.

Activities to Meet Objective 1	Proposed Timeline to Meet Objective 1
a.) Create a "Directory of Services" which contains contact persons for each school district, shelter, local Dept of Public Welfare and Social Service offices, and pertinent community agencies.	Create directory for Cape Cod and Islands: June 1990 Create a state-wide directory: October - November 1990
b.) Disseminate this directory to all agencies, individuals working with homeless families.	June - December 1990
c.) Revise directory.	June 1991
d.) Explore existing collaborations between schools, shelters and social service agencies. Disseminate this information to other schools, shelters and social service agencies.	June 1990 - May 1992

Objective #2:

The Department of Education will continue to receive input from school districts and shelter providers through the use of Task Forces and meetings with these groups.

Activities to Meet Objective 2	Proposed Timeline to Meet Objective 2
a.) Continue with Adolescent Task Force to address issues pertinent to the education of adolescents in shelter care.	re-start meetings of Task Force: August 1990 Meet with Task Force as needed
b.) Director of Office for Education of Homeless Children and Youth continue to attend meetings of the Coalition of Adolescent Emergency Services (CAES)	Attend monthly meetings
c.) Organize annual or semi-annual meetings with school personnel involved with homeless children.	Meeting co-sponsored with Education Development Center (EDC): June 1990; Hold annual meetings: 1991, 1992

Appendix A

List of Accomplished Objectives and Activities From September 1988 to May 1990

The Massachusetts Department of Education's Office for the Education of Homeless Children and Youth was established in September 1988 with a grant from the United States Department of Education under the Stewart B. McKinney Homeless Assistance Act. Over the past 21 months this agency has taken positive steps to ensure homeless children across the Commonwealth are attending school and receiving appropriate services. A number of objectives and activities proposed in the initial plan (March 1989) have been met. Since September 1988 the Department has attempted to address the educational needs of omeless children by:

- Clarifying its policy regarding which schools homeless children are entitled to attend. This information was disseminated to schools, shelters and other agencies through a memo from Commissioner Raynolds. This information was disseminated (in English, Spanish and Portuguese) to homeless parents through a brochure "Keeping Your Children in School".

- Attempting to provide transportation for homeless children attending their original school which is in a district different than the one in which they are temporarily residing, through variety of measures:

  1) Filing a bill (action by the Board of Education) in November 1988 (with a re-file of this bill in November 1989) which would reimburse cities and towns for the transportation of homeless children across district lines.

  2) Recommending the Governor's budget for Fiscal Year 1991 include an amendment to the Department's transportation line item which would provide up to $50,000 for reimbursement to cities and towns which transport homeless children across district lines.

  3) Collaborating with the Department of Public Welfare to design a system by which school districts can access Emergency Assistance money for transporting homeless children to/from school across district lines.

  4.) Setting up meetings on the local level with communities which are experiencing difficulty with school transportation for homeless children.

  5.) Working with the National Association of the State Coordinators of the Office for the Education of Homeless Children and Youth, and members of Congress to make amendments to the McKinney Act which would increase federal funds for direct services to homeless children, including money for transportation.

- Creating a policy detailing how schools can expedite the transfer of school and immunization records for homeless children.

- Developing tutor volunteer networks for homeless children who are academically behind by:

  1.) Providing grants to three school districts to design and implement tutor volunteer networks for the homeless children they serve. The Department organized a tutor training session at each of the three sites and conducted evaluation of the programs.

  2.) Developing a network of volunteers to work with children in Boston area shelters.

- Defining the educational needs of adolescents in short-term shelter care and attempting to meet those needs by:

  1.) Providing grants to three adolescent shelters to develop an in-house educational component for those youth unable to attend either the local school or their school of origin. The Department continues to conduct the evaluation of these projects.

  2.) Linking adolescent shelters with Chapter 1 services.

  3.) Forming an adolescent task force.

- Sensitizing school personnel to the unique needs of homeless children by:

  1.) Conducting regional inservices across the state to bring school personnel together with shelter providers, homeless families, and social service providers. Such workshops have taken place in the Northeast Region, Central Massachusetts Region and the Greater Springfield Region. (Three more are scheduled for September and October 1990.)

  2.) Holding inservice workshops for individual schools, school districts, and school administrators.

  3.) Designing and disseminating a brochure entitled "Working with Homeless Families: Strategies for School Personnel."

  4.) Writing and disseminating an article on the effects of homelessness on children.

- Collaborating with other state and community agencies and advocacy groups by:

  1.) Forming an Advisory Committee to the Office for the Education of Homeless Children and Youth. This Advisory Committee was instrumental in drafting the State Plan to Meet the Educational Needs of Homeless Children and Youth (March 1989).

2.) Participating as a member of the Massachusetts Interagency Council on Homelessness and Housing.

3.) Coordinating with the Department of Social Services Cape and Islands office to create a Network for Homeless Children on Cape Cod.

4.) Holding an informational meeting for shelter providers on Department of Education policies and regulations.

- Disseminating information about the status of homeless children in the state by:

1.) Conducting surveys in 1988, 1989 and 1990 to determine the number of homeless children in the state, the percentage of these children not attending school, and the unique needs of this population.

2.) Disseminating information received through the survey by writing and distributing a report on homeless children in December 1988 and January 1990.

Appendix B

Composite Timeline for Proposed Activities

Month/ Year	Activity	Activity	Activity	Activity	Activity
May 1990	create brochure on EA transportation funds	apply for McKinney exemp program funds	develop Boston volunteer network		
June 1990		revise parent brochure			
July 1990		initial dissemination of revised parent brochure	organize travelling inservice team		
August 1990	initial dissemination of brochure on EA transportation funds	set up meeting between Boston school personnel & shelters	re-start meetings of adolescent Task Force	design brochure about travelling inservice team disseminate to schools	
September 1990	hold informational meeting for adolescent shelters about Chapter 1 funds	design inservice workshops for homeless parents; disseminate brochure on these	inservice workshops: Cape Code, South Shore, Greater Pittsfield	start inservices workshops for individual schools and school districts	
October 1990	organize and hold informational meetings for shelters	hold inservices for homeless parents	inservice for school personnel in Greater Boston area		
November 1990	conduct inservices for shelters				
December 1990	send data collection info to USED	write report on findings of data collection			
January 1991	disseminate report on status of homeless children in Massachusetts				
March 1990	formal evaluation of adolescent and school-based programs				
April 1990		apply for McKinney exemplary program funds			

Month/Year	Activity	Activity	Activity
May 1991	collect data on homeless children in Massachusetts		
June 1991	revise Cape Cod and state-wide directories	hold meeting for school personnel	

Ongoing Activities

* Pursue language regarding homeless children in the Department of Education's budget .
* Pursue legislation to provide reimbursement for transportation of homeless children.
* Pursue changes in McKinney Act to allow for funds for direct services to homeless children.
* Continue creating and working with local homeless children's networks.
* Disseminate pertinent information to homeless families, school districts, social service providers, etc.
* Hold school- and district-wide inservices.
* Hold informational meetings for homeless parents and shelter providers.
* Explore funding sources for educational services for homeless children.

Appendix C

List of Regional Education Center Homeless Liaisons

Western Massachusetts Regional Center

Mary Birks
Western Mass. Regional Center
Macek Drive
Chicopee, MA 01013
(413) 594-8511

This region includes the following cities and towns:

Adams	Agawam	Alford
Amherst	Ashfield	Becket
Belchertown	Bernardston	Blandford
Buckland	Charlemont	Cheshire
Chester	Chesterfield	Chicopee
Clarksburg	Colrain	Conway
Cummington	Dalton	Deerfield
Easthampton	East Longmeadow	Egremont
Erving	Florida	Gill
Goshen	Granby	Granville
Great Barrington	Greenfield	Hadley
Hampden	Hancock	Hatfield
Hawley	Heath	Hinsdale
Holyoke	Huntington	Lanesborough
Lee	Lenox	Leverett
Leyden	Longmeadow	Ludlow
Middlefield	Monroe	Monson
Montague	Monterey	Montgomery
Mount Washington	New Ashford	New Marlborough
New Salem	North Adams	Northampton
Northfield	Orange	Otis
Palmer	Pelham	Peru
Petersham	Pittsfield	Plainfield
Richmond	Rowe	Russell
Sandisfield	Savoy	Sheffield
Shelburne	Shutesbury	Southampton
South Hadley	Southwick	Springfield
Stockbridge	Sunderland	Tolland
Tyringham	Ware	Warwick
Washington	Wendell	Westfield
Westhampton	West Springfield	West Stockbridge
Whately	Wilbraham	Williamsburg
Williamstown	Windsor	Worthington
Northampton-Smith	Adams-Cheshire	Amherst-Pelham
Ashfield-Plainfield Reg.	Berkshire Hills	Buckland Colrain Shel.
Chesterfield-Goshen	Central Berkshire	Frontier
Gateway	Gill-Montague	Hampden-Wilbraham
Hampshire	Hawlemont	Mount Greylock
Mohawk Trail	New Salem-Wendell	Pioneer Valley
Ralph C. Mahar	Southern Berkshire	Southwick-Tolland
Franklin County	Northern Berkshire Voc.	Pathfinder V.T.

Southeast Regional Center

Peter Murphy
Human Services Building
33 Main Street - Suite 2
Lakeville, MA 02347
(508) 947-1231 X-445

This region includes the following cities and towns:

Abington
Avon
Bourne
Bridgewater
Carver
Cohasset
Dighton
Eastham
Fairhaven
Foxborough
Gosnold
Hanson
Holbrook
Lakeville
Marshfield
Middleborough
New Bedford
Norwell
Pembroke
Privincetown
Raynham
Rockland
Seekonk
Stoughton
Tisbury
Wellfleet
West Tisbury
Yarmouth
Dighton-Rehoboth
Marthas Vineyard
Silver Lake
Bristol-Plymouth
Greater New Bedford
South Shore Reg.

Acushnet
Barnstable
Braintree
Brockton
Chatham
Dartmouth
Duxbury
Easton
Fall River
Freetown
Halifax
Harwich
Hull
Mansfield
Mashpee
Milton
North Attleboro
Oak Bluffs
Plymouth
Quincy
Rehoboth
Sandwich
Sharon
Swansea
Truro
West BridgewaterWeymouth
Bridgewater-Raynham
Nauset
Old Rochester
Whitman-Hanson
Cape Cod Reg.
Old Colony V.T.
Upper Cape Cod

Attleboro
Berkley
Brewster
Canton
Chilmark
Dennis
E. BridgewaterEdgartown
Falmouth
Gay Head
Hanover
Hingham
Kingston
Marion
Mattapoisett
Nantucket
Norton
Orleans
Plympton
Randolph
Rochester
Scituate
Somerset
Taunton
Wareham
Westport
Whitman
Dennis-Yarmouth
Freetown-Lakeville
Plymouth-Carver
Blue Hills
Greater Fall River
Southeastern
Bristol County

Central Massachusetts Regional Center

Lynne Simonds
Beaman Street, Route 140
West Boylston, MA 01583
(508) 835-6266

This region includes the following cities and towns:

Acton	Ashburnham	Ashby
Ashland	Athol	Auburn
Ayer	Barre	Bellingham
Berlin	Blackstone	Bolton
Boxborough	Boylston	Brimfield
Brookfield	Carlisle	Charlton
Clinton	Concord	Dedham
Douglas	Dover	Dudley
E. Brookfield	Fitchburg	Framingham
Franklin	Gardner	Grafton
Hardwick	Harvard	Holden
Holland	Holliston	Hopedale
Hopkinton	Hubbardston	Hudson
Lancaster	Leicester	Leominster
Lincoln	Lunenburg	Marlboro
Maynard	Medfield	Medway
Mendon	Milford	Millbury
Millis	Millville	Natick
Needham	New Braintree	Nolfolk
Northboro	Northbridge	N. Brookfield
Norwood	Oakham	Oxford
Paxton	Pepperell	Phillipston
Plainville	Princeton	Royalston
Rutland	Sherborn	Shirley
Shrewsbury	Southboro	Southbridge
Spencer	Sterling	Stow
Sturbridge	Sudbury	Sutton
Templeton	Townsend	Upton
Uxbridge	Wales	Walpole
Warren	Wayland	Webster
Wellesley	Westboro	W. Boylston
W. Brookfield	Westminster	Weston
Westwood	Winchendon	Worcester
Wrentham	Worcester Trade	Acton-Boxboro
Ashburnham-Westminster	Athol-Royalston	Berlin-Boylston
Blackstone-Millville	Concord-Carlisle	Dover-Sherborn
Dudley-Charlton	King Phillip	Lincoln-Sudbury
Mendon-Upton	Narragansett	Nashoba
Northboro-Southboro	N. Middlesex	Quabbin
Spencer-E. Brookfield	Tantasqua	Wachusett
Quaboag Regional	Assabet Valley	Blackstone Valley
So. Middlesex Reg.	Montachusett V.T.	S. Worcester County
Tri County	Norfolk County Agr.	

Northeast Regional Center

Darlene Lynch
790 Turnpike Street
North Andover, MA 01845
(508) 689-0164

This region includes the following cities and towns:

Amesbury
Bedford
Billerica
Burlington
Danvers
Essex
Gloucester
Hamilton
Lawrence
Lowell
Malden
Medford
Methuen
Newbury
N. Andover
Reading
Rowley
Saugus
Swampscott
Tyngsboro
Watertown
W. Newbury
Winthrop
Groton-Dunstable
Pentucket
Greater Lowell V.T.
Northeast Metro
Whittier V.T.

Andover
Belmont
Boxford
Cambridge
Dracut
Everett
Groton
Haverhill
Lexington
Lynn
Manchester
Melrose
Middleton
Newburyport
N. Reading
Revere
Salem
Somerville
Tewksbury
Wakefield
Wenham
Wilmington
Woburn
Hamilton-Wenham
Triton
Minute Man V.T.
North Shore Reg.
Essex Agr. Tech.

Arlington
Beverly
Brookline
Chelmsford
Dunstable
Georgetown
Groveland
Ipswich
Littleton
Lynnfield
Marblehead
Merrimac
Nahant
Newton
Peabody
Rockport
Salisbury
Stoneham
Topsfield
Waltham
Westford
Winchester
Lawrence V.T
Masconomet
Greater Lawrence
Nashoba Valley Tech.
Shawsheen Valley V.T.

Boston/Chelsea Team

Gloria Zoll
Mass. Department of Education
1385 Hancock Street
Quincy, MA 02169
(617) 770-7532

APPENDIX D

MASSACHUSETTS DEPARTMENT OF EDUCATION COMPLAINT MANAGEMENT SYSTEM

OPENING LETTER

(To be sent after telephone contact to Respondent and within 3 days of receipt of complaint.)

(Date)

_____, Name of Complainant

_____, Address of Complainant

Re: Complaint #____-____
Student or Group Name

Dear _____:

This is to formally acknowledge receipt of your complaint indicating a possible violation of education-related state or federal law, Board of Education Regulations, or legal and Constitutional rights of students. This complaint was received in this Regional Center (via telephone/mail/or in person) on (date). Briefly, the issue which you have brought to our attention is (succinct statement of alleged noncompliance as expressed by complainant).

This Regional Education Center of the Department of Education is currently inquiring into the matter(s) you have brought to our attention, and the contact person in this office who will be of assistance to you in the resolution of this issue is (name of Education Specialist). The telephone number of this staff member is (telephone number).

For your future reference, the number which has been assigned to your particular complaint is indicated above. You should use this number whenever communicating with the Department of Education regarding this particular complaint.

I have enclosed a small brochure describing the Department of Education Complaint Management System. It provides you with a summary of the steps the Department takes in resolving all complaints brought to our attention. If you have further questions or concerns about this system, the Education Specialist will be able to answer them for you.

Again, your complaint is being addressed by the Education Specialist in this Regional Office who will be in communication with you in order that a determination can be made and your concerns addressed.

Sincerely,

Complaint System Support Person

cc: LEA/Collaborative/Private School Contact Person
Education Specialist
(NOTE: Do not send cc: if Complainant wishes to remain anonymous.)

(Form Revised 9/6/89)